

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Abdi Nazemian, et al.,
Plaintiffs,
vs.
NVIDIA Corporation,
Defendant.

Case No. 4:24-cv-01454-JST (SK)
Case No. 4:24-cv-02655-JST (SK)

**JOINT STIPULATION AND [PROPOSED]
ORDER CONSOLIDATING CASES**

Andre Dubus III, et al.,
Plaintiffs,
vs.
NVIDIA Corporation,
Defendant.

Case No. 4:24-cv-01454-JST (SK)
Case No. 4:24-cv-02655-JST (SK)

1 Pursuant to Federal Rule of Civil Procedure 42(a) , Plaintiffs Stewart O’Nan, Abdi Nazemian,
 2 Brian Keene, Susan Orlean, Andre Dubus III and Defendant NVIDIA Corporation jointly request that
 3 the above captioned actions (the “Actions”) be consolidated for all pretrial and trial proceedings. The
 4 parties, by and through their respective counsel of record, hereby stipulate the following:

5 1. WHEREAS, Plaintiffs Abdi Nazemian, Brian Keene, and Stewart O’Nan filed a Complaint
 6 on March 8, 2024 against Defendant NVIDIA Corporation in *Nazemian, et al. v. NVIDIA Corp.*, Case No.
 7 4:24-cv-01454-JST (N.D. Cal. March 8, 2024) (the “*Nazemian Action*”) (*Nazemian* Dkt. No. 1);

8 2. WHEREAS, on May 2, 2024, Plaintiffs Andre Dubus III and Susan Orlean filed a
 9 Complaint against Defendant NVIDIA Corporation in *Dubus, et al., v. NVIDIA Corp.*, Case No. 4:24-cv-
 10 02655-JST (N.D. Cal. May 2, 2024) (the “*Dubus Action*”) (*Dubus* Dkt. No. 1);

11 3. WHEREAS, on May 23, 2024, Plaintiffs filed an Administrative Motion to Consider
 12 Whether Cases Should be Related seeking to relate the *Dubus Action* to the *Nazemian Action* (*Nazemian*
 13 Dkt. No. 37);

14 4. WHEREAS, on May 29, 2024, this Court granted the motion and related the *Dubus*
 15 Action to the *Nazemian Action* (*Nazemian* Dkt. No. 47; *Dubus* Dkt. No. 17);

16 5. WHEREAS, on April 29, 2025, NVIDIA filed a motion to consolidate the *Nazemian*
 17 Action and *Dubus Action*. *See Nazemian* Dkt. No. 135; *Dubus* Dkt. No. 87.

18 6. WHEREAS, the parties agree that consolidation of the Actions will advance the just and
 19 efficient progress of this litigation (including in ongoing discovery in the Actions), reduce case
 20 duplication, conserve Court time and resources, avoid the need to contact parties and witnesses for
 21 multiple proceedings, minimize expenditure of time and money for all parties involved, and avoid the
 22 risk of inconsistent rulings. *See Fed. R. Civ. P. 42(a);*

23 7. WHEREAS, the parties have conferred and agreed that going forward, the *Nazemian*
 24 Action and the *Dubus Action* shall be consolidated for all purposes under Federal Rule of Civil
 25 Procedure 42(a);

26 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties
 27 and their respective counsel that, subject to the Court’s approval,

1 1. the *Nazemian* Action and the *Dubus* Action shall be consolidated for all purposes under
2 Federal Rule of Civil Procedure 42(a); and
3 2. the *Nazemian* and *Dubus* Actions shall be maintained under Master File Case No. 4:24-cv-
4 01454-JST (the “Consolidated Action”); and
5 3. Defendant’s motion to consolidate the *Nazemian* Action (*Nazemian* Dkt. No. 135) and the
6 *Dubus* Action (*Dubus* Dkt. 87) are denied as moot; and
7 4. Plaintiffs’ counsel shall file a proposal for the appointment of interim lead counsel by June 11,
8 2025.

1 Dated: May 12, 2025

Respectfully submitted,

2 By: /s/ Joseph R. Saveri

3
4 Joseph R. Saveri (SBN 130064)
5 Christopher K.L. Young (SBN 318371)
6 Evan Creutz (SBN 349728)
7 Elissa A. Buchanan (SBN 249996)
8 William Castillo Guardado (SBN 294159)
9 **JOSEPH SAVERI LAW FIRM, LLP**
10 601 California Street, Suite 1505
11 San Francisco, California 94108
12 Telephone: (415) 500-6800
13 Facsimile: (415) 395-9940
14 jsaveri@saverilawfirm.com
15 cyoung@saverilawfirm.com
16 ecreutz@saverilawfirm.com
17 eabuchanan@saverilawfirm.com
18 wcastillo@saverilawfirm.com

19 Matthew Butterick (SBN 250953)
20 1920 Hillhurst Avenue, #406
21 Los Angeles, CA 90027
22 Telephone: (323) 968-2632
23 Facsimile: (415) 395-9940
24 mb@buttericklaw.com

25 Justin A. Nelson (admitted *pro hac vice*)
26 Alejandra C. Salinas (admitted *pro hac vice*)
27 **SUSMAN GODFREY L.L.P**
28 1000 Louisiana Street, Suite 5100
29 Houston, TX 77002-5096
30 Telephone: (713) 651-9366
31 jnelson@susmangodfrey.com
32 asalinas@susmangodfrey.com

33 Rohit D. Nath (SBN 316062)
34 **SUSMAN GODFREY L.L.P**
35 1900 Avenue of the Stars, Suite 1400
36 Los Angeles, CA 90067-2906
37 Telephone: (310) 789-3100
38 RNath@susmangodfrey.com

39 Elisha Barron (admitted *pro hac vice*)
40 Craig Smyser (admitted *pro hac vice*)
41 **SUSMAN GODFREY L.L.P**
42 One Manhattan West, 51st Floor

New York, NY 10019
Telephone: (212) 336-8330
ebarron@susmangodfrey.com
csmysyer@susmangodfrey.com

Jordan W. Connors (admitted *pro hac vice*)
Trevor D. Nystrom (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P
401 Union Street, Suite 3000
Seattle, WA 98101
Telephone: (206) 516-3880
jconnors@susmangodfrey.com
tnystrom@susmangodfrey.com

Rachel J. Geman (pro hac vice)
Danna Z. Elmasry (pro hac vice)
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
250 Hudson Street, 8th Floor
New York, NY 10013
Tel.: 212.355.9500
rgeman@lchb.com
delmasry@lchb.com

Anne B. Shaver
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111
Tel.: 415.956.1000
ashaver@lchb.com

Betsy A. Sugar (pro hac vice)
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
222 2nd Avenue S. Suite 1640
Nashville, TN 37201
Tel.: 615.313.9000
bsugar@lchb.com

Brian D. Clark (admitted *pro hac vice*)
Laura M. Matson (admitted *pro hac vice*)
Arielle Wagner (admitted *pro hac vice*)
Eura Chang (admitted *pro hac vice*)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612)339-6900

Facsimile: (612)339-0981
bdclark@locklaw.com
lmmatson@locklaw.com
aswagner@locklaw.com
echang@locklaw.com

Attorneys for the Nazemian Plaintiffs and the Proposed Class

1 Dated: May 12, 2025

Respectfully submitted,

2 By: /s/ Bryan L. Clobes

3 Bryan L. Clobes (admitted *pro hac vice*)
 4 Alexander J. Sweatman (admitted *pro hac vice*)
 5 Mohammed Rathur (admitted *pro hac vice*)
6 CAFFERTY CLOBES MERIWETHER
7 & SPRENGEL LLP
 8 135 South LaSalle Street, Suite 3210
 9 Chicago, IL 60603
 Tel: 312-782-4880
 bclobes@caffertyclobes.com
 asweatman@caffertyclobes.com
 mrathur@caffertyclobes.com

10 David A. Straite (admitted *pro hac vice*)
11 DiCELLO LEVITT LLP
 12 485 Lexington Avenue, Suite 1001
 13 New York, NY 10017
 Tel. (646) 933-1000
 dstraite@dicellosevitt.com

14 Amy E. Keller (admitted *pro hac vice*)
 15 Nada Djordjevic (admitted *pro hac vice*)
 16 James A. Ulwick (admitted *pro hac vice*)
17 DiCELLO LEVITT LLP
 18 Ten North Dearborn Street, Sixth Floor
 19 Chicago, Illinois 60602
 Tel. (312) 214-7900
 akeller@dicellosevitt.com
 ndjordjevic@dicellosevitt.com
 julwick@dicellosevitt.com

20 Brian O'Mara (SBN 229737)
21 DiCELLO LEVITT LLP
 22 4747 Executive Drive
 23 San Diego, California 92121
 Telephone: (619) 923-3939
 Facsimile: (619) 923-4233
 briano@dicellosevitt.com

24
 25 *Counsel for the Dubus Plaintiffs and Proposed Class*

1 Dated: May 12, 2025

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &**
4 **SULLIVAN, LLP**

5 Sean S. Pak (SBN 219032)
6 seanpak@quinnemanuel.com
7 50 California Street, 22nd Floor
8 San Francisco, CA 94111
9 Telephone: (415) 875-6600
10 Facsimile: (415) 875-6700

11 Andrew H. Schapiro (admitted *pro hac vice*)
12 andrewschapiro@quinnemanuel.com
13 191 N. Wacker Drive, Suite 2700
14 Chicago, Illinois 60606
15 Telephone: (312) 705-7400
16 Facsimile: (312) 705-4001

17 Alex Spiro (admitted *pro hac vice*)
18 alexspiro@quinnemanuel.com
19 51 Madison Avenue, 22nd Floor
20 New York, NY 10010
21 Telephone: (212) 849-7000
22 Facsimile: (212) 849-7100

23 *Attorneys for Defendant NVIDIA Corporation*

~~PROPOSED~~ ORDER

PURSUANT TO JOINT STIPULATION, IT IS SO ORDERED.

Dated: May 13, 2025

The Honorable Jon. S. Tigar
U.S. District Court Judge